



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3530

000005

MAY 13 1998

REFLECT THE ATTENTION OF

ACTION MEMORANDUM

SE-5J

DATE:

SUBJECT: ACTION MEMORANDUM - Request for a Time Critical Removal Action at the Prairieland Steel Site, Havana, Mason County, Illinois.

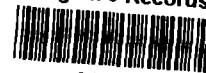
FROM: Sonia R. Vega, On-Scene Coordinator
Emergency Response Section II

TO: William Muno, Director
Superfund Division

THRU: Richard Karl, Chief *R. Karl*
Emergency Response Branch

Site ID #A525

EPA Region 5 Records Ctr.



246946

I. PURPOSE

The purpose of this Action Memorandum is to request and document approval to expend up to \$ 269,244 to abate an imminent and substantial threat to public health and the environment presented at the Prairieland Steel (PLS) site, 550 South Pear Street, Mason County, Havana, Illinois. The site was referred to the U.S. EPA by the Illinois Environmental Protection Agency (IEPA) for a removal assessment. This facility was brought to the IEPA's attention through several citizen complaints and numerous unresolved violations of the Resource Conservation and Recovery Act (RCRA). The facility was placed on the Comprehensive Environmental Response Compensation and Liability Information System, CERCLIS, in August, 1991. A preliminary assessment (PA) was performed in August, 1992. As a result of the assessment the site was evaluated and recommended for a potential removal action.

The facility re-draws ferrous wire. Electric motors are used to pull the wire through the redraw device. Prior to 1992, lead dross was used as a lubricant, and the initial wire cleaning included placing the wire in a three to one mixture of nitric acid and water with a pH of 1. Flux tanks were used during the lead pot process, which contained ammonium chloride and water. 1,1,1-trichloroethane (TCE) cleaner was used as a final step acting as a degreaser.

According to the owner's son, in 1992 the cleaning process changed from using nitric acid, TCE, and other hazardous materials to white soap and a non hazardous caustic cleaner.

The proposed removal action seeks to abate the imminent and substantial threat to human health and the environment posed by the presence of wastes at the site in drums and open vats. The proposed removal action seeks to alleviate this threat by removing and disposing of these wastes. It is estimated that the removal action will require approximately 40 on-site working days to complete. This proposed removal action is considered time critical due to the presence of abandoned incompatible waste materials from processes performed at the facility.

The site is not included on the National Priorities List (NPL).

II. SITE CONDITIONS AND BACKGROUND

CERCLIS ID # ILD005229497

Site Description and Background

The Prairieland Steel site is an active facility located south of Interstate 136 between Water and Schrader streets in the City of Havana, Mason County, Illinois. The area around the site is a mix of industrial and commercial enterprises. The legal description would include the site within the south one-half of section 1, Township 21 north, Range 9 west of the Third Principle Meridian of Mason County. The triangularly shaped site encompasses about two acres with approximately 25,000 square feet of building space. The facility is bordered by the Chicago and Illinois Railroad, Illinois Route 78 to the northwest, Walker Forge, Inc., to the east, and Crescent Forge and Shovel to the south.

On December 18, 1995, U.S. EPA's On-Scene Coordinators (OSCs) Fred Bartman and Sonia R. Vega, IEPA's Tim Murphy and Ken Corkill, and START member Ron Bugg performed a removal assessment at the site. The assessment team observed drums, vats, and cyclones present on site.

Discussions with the site owner confirmed a previous IEPA inspection report that the four drums containing TCE were sent to Ecolotec Inc., Dayton, OH.

Current Site Conditions

Approximately 70 drums (sixteen 55-gallon fiber drums and fifty-four 55-steel drums) are located inside the main building. Most of the drums are full; a few are partially filled with solid

material. Eleven open vats, containing liquid with an estimated volume of 500 to 1,000 gallons per vat, and two cyclones with a volume of approximately 300 gallons per cyclone are located in the southeast corner of the property.

Results from the sampling on December 18 showed that the pH of the liquids inside the vats and cyclone containers ranged from 1 to 12. Six vats and both cyclones had pH measurements of less than 2. The largest vat measured approximately 4 x 4 x 15 feet and the smallest vat measured approximately 4 x 4 x 6 feet. The wooden floors and platform surrounding the vats were visibly stained and deteriorating. Debris and floor sweepings were observed on, around, and under the wooden platform surrounding the vats.

Grab samples of solid material collected from containers at the PLS site were analyzed for Toxicity Characteristic Leaching Procedure (TCLP) RCRA metals. Analytical results collected from a steel 55 gallon drum container indicated a pH of 10, and a TCLP lead level of 1,600 mg/l.

State and Local Authorities Role

The City of Havana and the IEPA do not have sufficient funds or resources to conduct the removal of the hazardous wastes and hazardous substances found at this facility. The IEPA will continue to provide support to U.S. EPA during the removal efforts.

III. THREAT TO PUBLIC HEALTH OR WELFARE OR THE ENVIRONMENT, AND STATUTORY AND REGULATORY AUTHORITIES

Conditions present at the Prairieland Steel site constitute an imminent and substantial threat to public health and the environment, based upon considerations as set forth in the National Oil and Hazardous Substances Pollution Contingency Plan (NCP), 40 CFR Section 300.415(b)(2). Accordingly, a time-critical removal action is the appropriate response action at the Prairieland Steel site. These conditions include, but are not limited to, the following:

i) Actual or potential exposure to nearby human populations, animals, or the food chain from hazardous substances or pollutants or contaminants;

Site investigations conducted by both the U.S. EPA and the IEPA documented that approximately 74 drums, 11 vats, and two cyclone containers full or partially full of hazardous waste are present on site in uncontrolled, deteriorating, and leaking conditions, causing stained soils and deteriorating wood floors. Samples taken during the removal assessment documented significant

concentrations of TCLP lead in the solid waste inside the drums. On site screening of liquid waste inside the vats and cyclone containers show a pH of less than 2. According to 40 CFR § 261.22(a)(1), an aqueous solution with a pH of equal or less than 2, or equal or greater than 12.5 standard units, is considered to exhibit the criteria for corrosivity. As stated in RCRA, 40 CFR § 261.24, waste exhibits the characteristics of toxicity if, using the test methods described for determining TCLP, the waste level for lead is equal to or greater than 5.0 mg/l. Sample SDS-1 displayed TCLP lead level of 1,600 mg/l.

Site access to trespassers, vandals, and wildlife is partially restricted.

ii) Hazardous substances or pollutants or contaminants in drums, barrels, tanks, or other bulk storage containers, that may pose a threat of release;

Samples collected by the U.S. EPA indicate that hazardous materials are present on site. Results of pH screening reveal the presence of corrosive liquids. Many of the containers of hazardous or potentially hazardous materials are in poor condition. The uncontrolled and deteriorating state of the drums could pose a further, more significant threat of release.

iii) The availability of other appropriate Federal or State response mechanisms to respond to the release;

The IEPA referred this site to the U.S. EPA due to the lack of the necessary resources to undertake the clean up action or to respond to an emergency situation.

IV. ENDANGERMENT DETERMINATION

Open vats and improperly stored drums at the Prairieland Steel site contain acidic liquids and lead. These wastes pose potential inhalation, ingestion, and contact hazards to surrounding residents in this mixed residential/commercial area.

Given the present site conditions, the nature of hazardous substances on-site, and the potential exposure pathways described in Section III above, actual or threatened releases of hazardous substances from this site, if not addressed by implementing the response action selected in this Action Memorandum, may present an imminent and substantial endangerment to public health, welfare, or the environment.

V. PROPOSED ACTIONS AND ESTIMATED COSTS

A. Proposed Actions

1. Proposed Action Description

The purpose of this removal action is to mitigate the imminent and substantial threats posed to public health or welfare or the environment from wastes at the site. The proposed immediate response action includes the following actions:

- 1) A site safety plan will be prepared and implemented. The site will be secured to the extent practicable for completion of site activities.
- 2) The contents of vats, drums, and any other containers will be segregated, staged, sampled, and categorized for disposal. Compatible waste streams will be bulked and disposed of off-site.
- 3) All vats will be decontaminated, recycled, and/or disposed of as necessary to prevent future placement of waste material in these containers. Underlying and surrounding floor/soil/debris around the vats will be addressed as necessary (e.g., sampling, consolidation, and disposal).
- 4) Floors and walls will be sampled to determine the need for decontamination. If the floors and walls are contaminated they will be decontaminated if possible and left intact.

Waste transportation and disposal will be handled in full compliance with the Agency's off-site policy. Provisions for post-removal site control are not anticipated, as all wastes will be removed from the site and remaining structures will be decontaminated, as needed, to remove hazardous substances.

The response actions described in this memorandum directly address actual or threatened releases of hazardous substances, pollutants, or contaminants at the facility which may pose an imminent and substantial endangerment to public health and safety, and to the environment. These response actions do not impose a burden on affected property disproportionate to the extent to which that property contributes to the conditions being addressed.

2. Contribution to Remedial Performance

The Prairieland Steel site is a non-NPL site for which remedial actions have not been planned to date. The proposed removal action will address all threats meeting the NCP Section 300.415(b)(2) removal criteria as identified in Section III of this Action Memorandum.

3. Applicable or Relevant and Appropriate Requirements (ARARs)

All Federal ARARs and any Illinois ARARs identified in a timely manner will be complied with to the extent practicable. A letter has been sent to Tom Crause of IEPA requesting that the state identify state ARARs.

4. Project Schedule

It is estimated that the removal will be completed in approximately 40 working days.

B. Estimated Costs

The estimated costs of the recommended action are summarized below. The detailed ERCS contractor costs and initial cost projection scenario are presented in Attachment A. The estimated costs are as follows:

EXTRAMURAL COSTS

Clean Up Contractor Costs	\$161,845
Contingency (20%)	32,369
Subtotal	194,214
START	15,650
Total Extramural Costs	209,864
Extramural Contingency (15%)	<u>31,480</u>
TOTAL, EXTRAMURAL COSTS	\$241,344

INTRAMURAL COSTS

U.S. EPA Direct costs	
\$30/hr (300 Regional + 20 HQ)	\$ 9,600
U.S. EPA Indirect Costs	
\$61/hr (300 Regional Hrs)	<u>18,300</u>
TOTAL, INTRAMURAL COSTS	\$ 27,900

TOTAL REMOVAL PROJECT CEILING **\$269,244**

VI. EXPECTED CHANGE IN THE SITUATION SHOULD ACTION BE DELAYED OR NOT TAKEN

The current site conditions, the nature of the hazardous substances on-site, and the potential exposure pathways to the nearby population described in Sections II and III, if not addressed by implementing the response actions selected in this Action Memorandum, present an imminent and substantial endangerment to the public health, or welfare, or the environment. Implementation of the response actions selected in this Action Memorandum will mitigate the actual or threatened releases of hazardous substances from this site.

Without undertaking the aforementioned actions, releases may occur due to rupture of drums, vats, and containers within the facility's building. Additional spillage to the facility's work area could result in an overflow of hazardous wastes to the sanitary sewer, street or neighboring properties. A release of wastes to surrounding properties will contribute and ultimately lead to increased risks to public health and the environment.

VII. OUTSTANDING POLICY ISSUES

There are no outstanding policy issues for the Prairieland Steel site.

VIII. ENFORCEMENT

For administrative purposes, information concerning the enforcement strategy for this site is contained in the Enforcement Confidential Addendum (Attachment B).

IX. RECOMMENDATION

This decision document represents the selected removal action for the Prairieland Steel site, Havana, Mason County, Illinois, developed in accordance with CERCLA as amended, and is not inconsistent with the NCP. Conditions at the site meet the criteria of Section 300.415 (b)(2) of the NCP for a removal action and I recommend your approval of the proposed removal action. The total project ceiling requested is \$269,244. Of this, an estimated \$ 225,694 may be used for cleanup contractor costs. You may indicate your decision by signing below:

APPROVE:


DIRECTOR, SUPERFUND DIVISION

DATE:

5/13/96

DISAPPROVED:

DIRECTOR, SUPERFUND DIVISION

DATE:

ATTACHMENTS: A. ERCS Contractor Costs
B. Enforcement Confidential Addendum
C. Administrative Record Index

cc: E. Watkins, U.S. EPA HQ, 5202G
D. Henne, U.S. Department of the Interior
B. Everretts, IEPA

ATTACHMENT A
ERCS CONTRACTOR COSTS

Redacted - not relevant to the selection of the removal action.

ATTACHMENT B

ENFORCEMENT ADDENDUM

Redacted - not relevant to the selection of the removal action.